

# EXHIBIT A

LAW OFFICE OF PETER C. GORDON, LLC  
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ATTORNEY ID-0273411985  
ATTORNEY FOR PLAINTIFF

**KEVIN HARMS**

Plaintiff,

vs.

**WALMART,  
ABC CORPORATION (1-10),**

a fictitious name,

**DEF CORPORATION (1-10),**

a fictitious name, JOHN DOE (1-10),

MARY DOE (1-10),

fictitious names, fictitious persons,

intended being of unknown names,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: MORRIS COUNTY

DOCKET NO.:

CIVIL ACTION:

:COMPLAINT, JURY DEMAND, AND  
DEMAND FOR DISCOVERY,

Plaintiff, **KEVIN HARMS**, residing at P. Hensyn Village, Budd Lake, County of Morris  
State of New Jersey, by the way Complaint says:

**FIRST COUNT**

1. On and prior to March 25, 2019, Defendants, **WALMART, ABC CORPORATION (1-10)**, a fictitious name, **DEF CORPORATION (1-10)**, a fictitious name, **JOHN DOE**, and/or **MARY DOE**, fictitious names, fictitious persons, intended being of unknown names, are the owners, operators, and in control of the premises known as International Trade Center, 40 International Trade Center South, Flanders New Jersey.

2. On or about March 25, 2015, Plaintiff, **KEVIN HARMS**, was lawfully upon the premises known as International Trade Center, \$0 International Trade Center South, Flanders, New Jersey.
3. Said Defendants so negligently and improperly controlled, maintained constructed, and supervised the exterior of aforementioned premises including the parking lot so as to cause Plaintiff, **KEVIN HARMS**, to slip and fall and causing him to sustain serious personal injuries.
4. As a direct result of the negligence of the Defendants, Plaintiff, **KEVIN HARMS**, sustained serious personal injuries to his body, nervous systems, and other internal and external injuries, from which he suffered great pain, will continue to suffer great pain, was prevented from performing his usual work and activities, has incurred expenses from medical attention and sustained loss of income.

WHEREFORE, Plaintiff, **KEVIN HARMS**, demands judgment against the Defendants, **WALMART**, ABC CORPORATION (1-10), a fictitious name, DEF CORPORATION (1-10), JOHN DOE, and/or MARY DOE, fictitious names, fictitious persons, intended being of unknown names, individually, jointly, severally and in the alternative for damages, interest, costs of suit, and such other relief as the Court deems just and equitable on the First Count of the Complaint.

**JURY DEMAND**

Plaintiff demands a trial by jury of all issues in this action.

**DEMAND FOR PRODUCTION OF INSURANCE AGREEMENTS**

Pursuant to R. 4:10-2(b), demand is made that you disclose to the undersigned whether there are any insurance agreements or policies under which any persons or firm carrying on an insurance business may be liable to satisfy all part of a judgment which may be entered in the action to indemnify or reimburse for payment made to satisfy judgment. If so, please attach a copy of each, or in the alternative state, under oath and certification: a) policy number; b) name and address of insurer; c) inception and expiration date; d) name and address of all persons insured thereunder; e) personal injury limits; f) property damage limits; g) medical payment limits.

**TRIAL COUNSEL DESIGNATION**

PETER C. GORDON, ESQ., is designated as a trial counsel for Plaintiffs in this matter.

**REQUEST FOR ANSWERS TO INTERROGATORIES**

Plaintiffs request that Defendants furnish answers to Uniform Interrogatories within the time prescribed by the Rules of Court.

CERTIFICATION PURSUANT TO R.4:5-1

I certify that the matter in controversy is not the subject of any other pending or contemplated judicial or arbitration proceeding. I am not aware of any other parties that should be joined in this action.

By: \_\_\_\_\_



LAW OFFICE OF PETER C. GORDON, LLC

Attorney for Plaintiff